

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

VISA INC.,

*Defendant.*

Case No. 1:24-cv-07214-JGK-SLC

**DECLARATION OF BETH A. WILKINSON**

Beth A. Wilkinson declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of the bar of this Court and a partner with the law firm Wilkinson Stekloff, LLP, attorneys for Defendant Visa Inc. (Visa) in the above-captioned action. I submit this declaration in support of Visa's Motion to Dismiss the Complaint.
2. Attached hereto as Exhibit 1 is a true and correct copy of the Payment Platform Agreement ("Apple Technology Agreement"), a contract between Visa and Apple Inc. dated August 29, 2014. This document is referenced at Paragraph 136 of the Complaint.
3. Attached hereto as Exhibit 2 is a true and correct copy of Amendment No. 9 to the Apple-Visa Payment Platform Agreement, a contract between Visa and Apple Inc. dated June 3, 2021. The Apple-Visa Payment Platform Agreement is referenced at Paragraph 136 of the Complaint.
4. Attached hereto as Exhibit 3 is a true and correct copy of the Visa Global Strategic Merchant Initiative Agreement ("Apple Merchant Agreement"), a contract between Visa

and Apple Inc. dated April 1, 2022. This document is referenced at Paragraph 136 of the Complaint.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Amended and Restated Visa-PayPal Strategic Partnership Agreement (“PayPal Agreement”), a contract between Visa and PayPal, Inc. dated July 1, 2022. This document is referenced at Paragraph 124 of the Complaint.
6. Attached hereto as Exhibit 5 is a true and correct copy of the Amended and Restated Visa Direct Agreement, a contract between Visa and Block Inc. (formerly called Square) dated May 1, 2023. This document is referenced at Paragraph 132 of the Complaint.
7. Attached hereto as Exhibit 6 is a true and correct excerpt of the official transcript of the Court’s November 12, 2024 conference in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: December 16, 2024  
Washington, D.C.

/s/ Beth A. Wilkinson  
Beth A. Wilkinson